

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff

V.

**ONEPLUS TECHNOLOGY
(SHENZHEN) CO., LTD.**

Defendant.

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Civil Action No. 6:20-CV-00952-ADA
Civil Action No. 6:20-CV-00953-ADA
Civil Action No. 6:20-CV-00956-ADA
Civil Action No. 6:20-CV-00957-ADA
Civil Action No. 6:20-CV-00958-ADA

**DECLARATION OF MICHAEL J. LYONS IN SUPPORT OF
DEFENDANT’S REPLY IN SUPPORT OF DEFENDANT’S
OBJECTIONS TO SPECIAL MASTER’S REPORT AND
RECOMMENDATION REGARDING CLAIM CONSTRUCTION**

I, Michael J. Lyons, hereby declare as follows:

I am an attorney with the law firm Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“Defendant” or “OnePlus”) in the above captioned actions and am admitted *pro hac vice* in these actions. I have personal knowledge of the following facts. I have personal knowledge of the statements contained in this Declaration which are true and correct and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant's

October 28, 2021 Markman Hearing Presentation submitted to Special Master
Joshua J. Yi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of July 2022, in Palo Alto, California

/s/ Michael J. Lyons

Michael J. Lyons